

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

FRANCHISE GROUP, INC.,<sup>1</sup>

Reorganized Debtor.

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)  
) Chapter 11  
)  
) Case No. 24-12480 (LSS)  
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)  
) **Re: Docket No. 1596**  
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**CERTIFICATION OF COUNSEL REGARDING STIPULATION  
GRANTING CONTINENTAL CASUALTY COMPANY LIMITED  
RELIEF FROM THE PLAN INJUNCTION**

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On November 3, 2024, the above-captioned reorganized debtor (the “Reorganized Debtor”)<sup>2</sup> and its reorganized debtor affiliates filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 in the United States Bankruptcy Court for the District of Delaware (the “Court”).<sup>3</sup>

On June 2, 2025, the Court entered a Confirmation Order [Docket No. 1596], confirming the Plan as to all Debtors (the “OpCo Debtors”) other than Freedom VCM Holdings, LLC (“TopCo”). The Effective Date of the Plan with respect to the OpCo Debtors occurred on June 6, 2025, and the OpCo Debtors emerged from chapter 11 [Docket No. 1605]. On July 1, 2025,

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<sup>1</sup> The last four digits of Franchise Group, Inc.’s federal tax identification number are 1876. The mailing address for Franchise Group, Inc. is 2371 Liberty Way, Virginia Beach, Virginia 23456. The term “Reorganized Debtors” includes Franchise Group, Inc. and certain reorganized debtor affiliates, a complete list of which, including the last four digits of their federal tax identification numbers and addresses, may be obtained on the website of the Reorganized Debtors’ claims and noticing agent, at <https://cases.ra.kroll.com/FRG/>. All of the motions, contested matters, and adversary proceedings that remained open as of the closing of any of the Reorganized Debtors’ cases, or that are opened after the date thereof, are administered in the remaining chapter 11 case of Franchise Group, Inc., Case No. 24-12480 (LSS).

<sup>2</sup> References herein to the “Debtors” refer to the Reorganized Debtors prior to the Effective Date of the Plan (as defined below).

<sup>3</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the *Ninth Amended Joint Chapter 11 Plan of Franchise Group, Inc. and Its Debtor Affiliates* [Docket No. 1454] (the “Plan”).

the Court entered a Confirmation Order [Docket No. 1682], confirming the Plan with respect to TopCo. The Effective Date of the Plan with respect to TopCo occurred on July 3, 2025, and TopCo emerged from chapter 11 [Docket No. 1689].

On August 5, 2021, Jennifer Walker filed a civil action styled *Jennifer Walker v. PSP Stores, LLC d/b/a Pet Supplies Plus*, Case No. 2021 CH 03851 in the Circuit Court of Cook County, Illinois against Debtor PSP Stores, LLC (“PSP”) (the “Walker Action”). The Walker Action was dismissed by order of the court on October 16, 2025.

On or about February 24, 2022, PSP sought coverage from Continental Casualty Company (“Continental”) under Continental Policy No. GL 4014105374 for the policy period from September 12, 2012 to January 15, 2014 (such policy, the “Insurance Policy”) for the Walker Action.

On June 14, 2022, Continental sent a letter to PSP denying coverage for the Walker Action.

On June 15, 2022, Continental filed a Complaint for Declaratory Judgment in a civil action styled *Continental Casualty Company v. Pet Supplies “Plus” Holding, LLC, et al.*, Case No. 2:22-cv-11324 in the United States District Court for the Eastern District of Michigan (the “District Court Action”) seeking a declaration that it has no duty to defend PSP in connection with the Walker Action under the Insurance Policy [District Court Action, Docket No. 1].

On November 15, 2024, the District Court Action was administratively closed in light of PSP’s Notice of Bankruptcy Filing and Automatic Stay [District Court Action, Docket Nos. 30, 31].

On October 27, 2025, Continental filed *Plaintiff’s Motion to Lift the Automatic Stay and Request for Status Conference to Address Pending Motion for Summary Judgment in Continental*

*Casualty Company v. Pet Supplies “Plus”, et al.*, in the District Court Action [District Court Action, Docket No. 35].

The Reorganized Debtor and Continental have documented the terms of their agreement in that certain *Stipulation Granting Continental Casualty Company Limited Relief from the Plan Injunction* (the “Stipulation”), which is attached as Exhibit 1 to the proposed form of order attached hereto as **Exhibit A** (the “Proposed Order”). The Stipulation, by its terms, is effective only upon entry of the Proposed Order.

WHEREFORE, as the Reorganized Debtor and Continental consent to entry of the Proposed Order, and counsel for the Litigation Trust has indicated no objection to entry of the Proposed Order, the Reorganized Debtor respectfully requests entry of the Proposed Order at the Court’s earliest convenience without further notice or a hearing.

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Dated: November 25, 2025  
Wilmington, Delaware

*/s/ Allison S. Mielke*

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